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Hearing Date: June 21, 2011 at 10:00 a.m.

Attorneys for Wells Fargo Bank, N.A.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 11

DELPHI CORPORATION, *et al.*,

Case No. 05-44481 (RDD)

Debtors.

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DELPHI CORPORATION *et al.*,

Plaintiff,

Adv. Pro. 07-02597 (RDD)

-against-

WELLS FARGO BUSINESS AND WELLS
FARGO MINNESOTA,

Defendants.
-----X

**JOINDER OF WELLS FARGO BANK, N.A. (NAMED HEREIN AS WELLS
FARGO BUSINESS AND WELLS FARGO MINNESOTA) TO SUR-REPLIES
IN FURTHER OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO
FILE A FIRST AMENDED COMPLAINT**

Wells Fargo Bank, N.A. (incorrectly named herein as Wells Fargo Business and Wells Fargo Minnesota (together, "Wells Fargo" or "Defendant")), by its undersigned attorneys, hereby joins, adopts and incorporates by reference the arguments set forth and exhibits annexed to the (i) Sur-Reply of Johnson Controls, Johnson Controls Battery Group and Johnson Controls, Inc. in Further Opposition to Plaintiff's Motion for Leave to File a First Amended Complaint, dated June 13, 2011 (Case No. 05-44481, Docket No. 21312); (ii) Methode Electronics, Inc.'s Sur-Reply in Support of its Objection to the Reorganized Debtors' Motion for Leave to File Amended Complaints dated June 14, 2011 (Case No. 05-44481, Docket No. 21319); (iii) Sur Reply of Victory

Packaging LP in Further Support of its Brief in Opposition to the Reorganized Debtors' Motion for Leave to File Amended Complaints, dated June 14, 2011 (Case No. 05-44481, Docket No. 21326); and (iv) Sur-Reply of The Timken Company and The Timken Corporation in Further Opposition to Reorganized Debtors' Motion for Leave to File Amended Complaints, dated June 14, 2011 (Case No. 05-44481, Docket No. 21329); and (v) any other subsequently filed sur-reply brief.

The facts set forth in the above-referenced Sur-Replies are substantially the same with respect to Wells Fargo so that any relief granted for the benefit of one or the other of the complaining preference defendants should be granted for all and others who are similarly situated.

Dated: Uniondale, New York
June 15, 2011

RUSKIN MOSCOU FALTISCHEK, P.C.

By: /s/ Jeffrey A. Wurst
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